

USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC #:  
DATE FILED: 09/30/2013

Buchwald, N.

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

IN RE LIBOR-BASED FINANCIAL  
INSTRUMENTS ANTITRUST LITIGATION

THIS DOCUMENT RELATES TO: EXCHANGE-  
BASED PLAINTIFFS' ACTION

MDL No. 2262, 11 Civ. 2613

Master File No. 1:11-md-2262-NRB

ECF Case

**STIPULATION AND ~~PROPOSED~~ ORDER**

IT IS HEREBY STIPULATED AND AGREED by and between the undersigned counsel for the Exchange-Based Plaintiffs and the undersigned counsel for defendant Société Générale that:

1. Société Générale was added as a defendant to Exchange-Based Plaintiffs' Second Amended Consolidated Class Action Complaint, dated September 10, 2013, following the Court's August 23, 2013 memorandum and order granting Exchange-Based Plaintiffs leave to do so. Exchange Based Plaintiffs subsequently filed a [Corrected] Second Amended Consolidated Class Action Complaint, dated September 16, 2013 ("Second Amended Complaint").

2. Société Générale's joining in Defendants' Motion for Reconsideration of March 29, 2013 Order on Motion to Dismiss shall be without prejudice to or waiver of Société Générale's right to seek leave from the Court to file its own motion to dismiss the Second Amended Complaint.

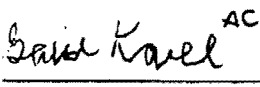
3. Société Générale's joining in Defendants' Motion for Leave to File Renewed Motion to Dismiss the Exchange-Based Plaintiffs' Period 2 CEA Claims shall be without prejudice to or waiver of Société Générale's right to seek leave to file its own motion to dismiss the Second Amended Complaint.

4. The parties will endeavor to submit a joint proposed briefing schedule in connection with Société Générale's anticipated motion for leave to file motion to dismiss the

Second Amended Complaint, and/or to otherwise work with the Court to achieve scheduling efficiency in light of the other motions pending in this action.

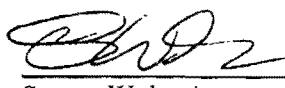
Dated: September 23, 2013

KIRBY McINERNEY LLP

By:  <sup>AC</sup>  
David Kovel  
Daniel Hume  
Andrew McNeela  
Lauren Wagner Pederson (*Of Counsel*)  
Roger Kirby (*Of Counsel*)  
825 Third Avenue, 16<sup>th</sup> Floor  
New York, NY 10022  
[dkovel@kmlp.com](mailto:dkovel@kmlp.com)  
[dhume@kmlp.com](mailto:dhume@kmlp.com)  
[amcnella@kmlp.com](mailto:amcnella@kmlp.com)  
[roger.w.kirby@gmail.com](mailto:roger.w.kirby@gmail.com)  
[lpederson@kmlp.com](mailto:lpederson@kmlp.com)

*Attorneys for Exchange-Based Plaintiffs*

MAYER BROWN LLP

By:   
Steven Wolowitz  
Henninger S. Bullock  
Andrew J. Calica  
1675 Broadway  
New York, New York 10019  
Telephone: (212) 506-2500  
Facsimile: (212) 262-1910  
[swolowitz@mayerbrown.com](mailto:swolowitz@mayerbrown.com)  
[hbullock@mayerbrown.com](mailto:hbullock@mayerbrown.com)  
[acalica@mayerbrown.com](mailto:acalica@mayerbrown.com)

*Attorneys for Société Générale*

SO ORDERED:

  
U.S.D.J.

<sup>gm</sup>  
9/27/13